Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:
United Can Company
Facility #A0218

Facility Address:
Burbank Street & C Street
Hayward, CA 94540

Mailing Address:
P.O. Box 3457
Hayward, CA 94540

Responsible Official
Jim Kramm, Operations Manager
(510) 881-4517

Facility Contact
Jim Kramm, Operations Manager
(510) 881-4517

Type of Facility: Can Plant
Primary SIC: 3411
Product: Coated steel to make cans

BAAQMD Permit Division Contact:
Donald P. Van Buren, P.E.

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Ellen Garvey
Ellen Garvey, Executive Officer/Air Pollution Control Officer

July 28, 1999
Date

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions
(as amended by the District Board on 10/7/98);

SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 9/29/98);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA through 6/23/95);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration
(as approved by EPA through 10/19/84); and

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 10/7/98).

SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 1/26/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit expires on July 28, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than January 28, 2004 and no earlier than July 28, 2003 **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after July 28, 2004.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-

I. Standard Conditions

issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

All required monitoring reports must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. All instances of non-compliance shall be clearly identified in these reports. The reports shall

I. Standard Conditions

be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit

I. Standard Conditions

holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)

3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
S-47	Sheet Coater	Wagner	15 Inch Coater	
S-48	Curing Oven (Natural Gas)	Young Bros.	D.E.F., 130 ft., 4 zone	10.5 million BTU/hr
S-49	Sheet Coater	Wagner	15 Inch Coater	
S-50	Curing Oven (Natural Gas)	Young Bros.	D.E.F., 130 ft., 4 zone	10.5 million BTU/hr
S-51	Sheet Coater	Wagner	15 Inch Coater	
S-52	Sheet Coater	Wagner	12 Inch Coater	
S-53	Lithographic Press	Harris Offset Press		
S-54	Lithographic Press	Harris Offset Press		
S-55	Curing Oven (Natural Gas)	Young Bros.	D.E.F., 106 ft., 3 zone	8.4 million BTU/hr
S-56	Curing Oven (Natural Gas)	Young Bros.	D.E.F., 106 ft., 3 zone	8.4 million BTU/hr
S-57	Curing Oven (Natural Gas)	Young Bros.	D.E.F., 106 ft., 3 zone	8.4 million BTU/hr
S-59	Sheet Coater	Wagner	12 Inch Coater	
S-60	Lithographic Press	Harris Offset Press		
S-61	Lithographic Press	Harris Offset Press		
S-64	Lithographic Press	Harris Offset Press		
S-65	Lithographic Press	Harris Offset Press		
S-71	Storage Tank		Under-ground	6,000 gallon capacity
S-130	Line 7 Coater	Wagner	12 Inch Coater	
S-131	Line 7 Oven (Natural Gas)	Wagner	80 ft.	3.6 million BTU/hr

II. Equipment

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A-6	Regenerative Thermal Oxidizer	47, 48, 49, 50, 51, 52, 55, 56, 57, 59, 130, 131	Regulation 8, Rule 11	1400 F minimum temperature	NA
A-6	Regenerative Thermal Oxidizer	47, 48, 49, 50, 51, 52, 55, 56, 57, 59, 130, 131	Regulation 8, Rule 11	Negative inlet pressure to RTO, coater and oven fans on, oven dampers and coating damper to RTO fully open.	NA
A-6	Regenerative Thermal Oxidizer	47, 48, 49, 50, 51, 52, 55, 56, 57, 59, 130, 131	Regulation 8, Rule 11	1400 F minimum temperature and negative inlet pressure to RTO, coater and oven fans on, oven dampers and coating damper to RTO fully open.	90% Abatement device efficiency
A-6	Regenerative Thermal Oxidizer	47, 48, 49, 50, 51, 52, 55, 56, 57, 59	BAAQMD Cond# 12332	1400 F minimum temperature and negative inlet pressure to RTO, coater and oven fans on, oven dampers and coating damper to RTO fully open.	98% Abatement device efficiency and 90% overall abatement
A-6	Regenerative Thermal Oxidizer	130, 131	BAAQMD Cond# 12332	1400 F minimum temperature and negative inlet pressure to RTO, coater and oven fans on, oven dampers and coating damper to RTO fully open.	98% Abatement device efficiency and 96% overall abatement

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

1. The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:
2. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
3. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

Where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)	N
SIP Regulation 1	General Provisions and Definitions (9/29/98)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. Additionally, where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S 47, 49, 51, 52, 59 AND 130– SHEET COATERS
S 48, 50, 55, 56, 57 AND 131– CURING OVENS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 11	**Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)**		
8-11-301	Metal Container or Closure Coating Limitations	N	
8-11-301.1	VOC Limit – Sheet Basecoat and Overvarnish	Y	
8-11-302	Emission Control Device Requirement	Y	
8-11-306	Surface Preparation and Cleanup Solvent	Y	
8-11-402	Operation and Maintenance Plan	Y	
8-11-501	Coating Records	Y	
8-11-504	Afterburner Temperature, Monitoring	Y	

IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S 47, 49, 51, 52, 59 AND 130– SHEET COATERS
S 48, 50, 55, 56, 57 AND 131– CURING OVENS

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition #12332			
part 1	A-6 Afterburner Abatement Requirement (basis: Offsets, BACT)	Y	
part 2	Usage limits and optional emission limits (basis: Offsets, BACT)	Y	
part 3	Minimum A-6 Destruction Efficiency and Combined Capture plus Destruction Efficiency (basis: Offsets, BACT)	Y	
part 4	Minimum A-6 Afterburner Combustion Chamber Temperature (basis: Offsets, BACT)	Y	
part 6	A-6 Afterburner fueled only with natural gas (Basis: cumulative increase)	Y	
part 7	Natural gas fuel meter requirement (Basis: cumulative increase)	Y	
part 8	Source test requirement (Basis: Regulation 2-6-409.2)	Y	
part 9	Required instrumentation and controls to allow sheet feeding (oven related) (Basis: Regulation 2-6-409.2)	Y	
part 10	Requirement to operate coater fan and have coater exhaust hood in place (Basis: Regulation 2-6-409.2)	Y	
part 11	Required instrumentation and controls to allow sheet feeding (coater related) (Basis: Regulation 2-6-409.2)	Y	
part 12	Required minimum oven fan speeds (Basis: Regulation 2-6-409.2)	Y	
part 13	Record keeping (basis: BACT, Toxic Risk Screen, Cumulative Increase, RACT, Regulation 1-441, Regulation 2-6-409.2, Regulation 8-11-501 and 504)	Y	
part 14	Allowable A-6 temperature excursions (Basis: Regulation 2-1-403)	Y	
part 15	Record keeping for allowable temperature excursions (basis: Regulation 2-1-403)	Y	
part 16	Temperature excursion definition (basis: Regulation 2-1-403)	Y	

IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S 53, 54, 60, 61, 64, 65 – LITHOGRAPH PRESSES

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
SIP Regulation 8, Rule 11	**Organic Compounds – Metal Container, Closure And Coil Coating (12/23/97)**		
8-11-301	Metal Container or Closure Coating Limitations	Y	
8-11-301.9	VOC Limit – Inks	Y	
BAAQMD Regulation 8, Rule 11	**Organic Compounds – Metal Container, Closure And Coil Coating (11/19/97)**		
8-11-301	Metal Container or Closure Coating Limitations	N	
8-11-301.10	VOC Limit – Inks	N	
8-11-306	Surface Preparation and Cleanup Solvent	Y	
8-11-501	Coating Records	Y	

Table IV - C
Source-specific Applicable Requirements
S 71 – STORAGE TANK

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 5	**Organic Compounds - General Provisions (5/4/88)**	N	
8-5-301	Standards - Storage Tanks Smaller than 150m^3	Y	
8-5-328	Tank Cleaning Requirements	Y	
8-5-501	Records	Y	

IV. Source-specific Applicable Requirements

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition # 12332

For S-47, S-48, S-49, S-50, S-51, S-52, S-55, S-56, S-57, S-59, S-130, S-131, COATERS AND OVENS:

1) The VOC emissions from the following coater/oven sources shall be abated by afterburner A-6 during all times of operation.
   a) S-47/S-48
   b) S-49/S-50
   c) S-51/S-55
   d) S-52/S-56
   e) S-59/S-57
   f) S-130/S-131

   (Basis: Offsets, BACT)

2) The following annual coating usage limits at S-130/S-131, coater/oven, shall not be exceeded unless the owner/operator can demonstrate from usage records and VOC calculations that total precursor organic emissions from S-130/S-131 do not exceed 15,038 pounds in any consecutive twelve month period:

   a) Epoxy 53,573 gal/yr @ 73% v/v VOC
   b) High solid enamel 22,015 gal/yr @ 35% v/v VOC

   (Basis: Offsets, BACT)

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Condition # 12332

For S-47, S-48, S-49, S-50, S-51, S-52, S-55, S-56, S-57, S-59, S-130, S-131, COATERS AND OVENS:

3) United Can Co. shall maintain a combined capture and destruction efficiency for VOCs produced in the above coater/oven lines of at least 90% by weight by afterburner A-6 except that the combined capture and destruction efficiency for VOCs produced in the coater/oven line S-130/S-131 shall be at least 96% by weight. The afterburner A-6 shall be maintained in proper operating condition and the destruction efficiency shall be maintained at or above 98% by weight. (Basis: Offsets, BACT)

4) The minimum operating temperature in the retention chamber of afterburner A-6 shall be 1400 degrees F. This minimum operating temperature may be adjusted by the District if the source test required under Part 8 indicates that a higher temperature is required for compliance with Part 3, or a lower temperature is capable of achieving the same compliance. (Basis: Offsets, BACT)

5) The afterburner A-6 shall be equipped with a temperature indicator and continuous temperature recorder. (Basis: Offsets, BACT, Regulation 8-11-504)

6) Afterburner A-6 shall burn only natural gas and shall use less than 888,000 therms in any consecutive twelve-month period. (Basis: Cumulative Increase)

7) The afterburner A-6 shall be equipped and monitored by a non-resettable, totalizing fuel use meter or District approved alternative compliance verification for Part 6. (Basis: Cumulative Increase)

8) Each calendar year, the owner/operator of afterburner A-6 shall perform at least one District approved source test to determine VOC capture and destruction efficiency for compliance with Part 3 above. The source test(s) shall include S-130/ S-131 and at least four of the other five lines. The results of any source test shall both be submitted to the District within 30 days of completion and retained on site. A source test which includes S-130/S-131 and at least four of the other five lines and documents both a combined capture and destruction efficiency for VOCs produced in the coater/oven lines of at least 96% and an A-6 destruction efficiency of at least 98% shall be presumed to demonstrate compliance with Part 3. (Basis: Regulation 2-6-409.2)

VI. Permit Conditions

Condition # 12332

For S-47, S-48, S-49, S-50, S-51, S-52, S-55, S-56, S-57, S-59, S-130, S-131, COATERS AND OVENS:

9) The Permit Holder shall maintain instrumentation and controls to not allow sheet feeding, on a line specific basis, when:

   a) The oven exhaust fan is off *or*
   b) The oven exhaust temperature is less than 190 degrees Fahrenheit or
   c) The pressure in the plenum immediately upstream of the oven exhaust fan is more positive than a negative 0.05 inches water column or
   d) The pressure in any oven zone heater is more positive than a negative 0.05 inches water column or
   e) The damper system downstream of the oven indicates either that the damper to the RTO is not fully open or that the damper that opens to atmosphere is not fully closed.

   (Basis: Regulation 2-6-409.2)

10) The Permit Holder shall not allow sheet feeding, on a line specific basis, when:

   a) The coater exhaust fan is off or
   b) The coater exhaust hood is elevated or removed from the coater

   (Basis: Regulation 2-6-409.2)

11) The Permit Holder shall maintain instrumentation and controls to not allow sheet feeding on any line when:

   a) The damper system downstream of the coaters indicates either that the damper to the RTO is not fully open or that the damper that opens to atmosphere is not fully closed or
   b) The inlet pressure to the afterburner A-6 is more positive than a negative 1-inch water column.

   (Basis: Regulation 2-6-409.2)

VI. Permit Conditions

Condition # 12332

For S-47, S-48, S-49, S-50, S-51, S-52, S-55, S-56, S-57, S-59, S-130, S-131, COATERS AND OVENS:

12) During coating operations, the Permit Holder shall operate each variable speed oven exhaust fan at or above the following variable frequency drive settings:
   a) For S-48: 25 Hz
   b) For S-50: 25 Hz
   c) For S-55: 25 Hz
   d) For S-56: 25 Hz
   e) For S-57: 25 Hz
   f) For S-131: 25 Hz

   (Basis: Regulation 2-6-409.2)

13) To determine compliance with the above conditions, the Permit Holder shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:

   a) Coating type and manufacturer identification. Note that any solvent added to a coating prior to application is considered to be part of the coating.
   b) Coating VOC content as purchased and as-applied.
   c) Gross and net amount of coating used per day and month per coater.
   d) Type and manufacturer identification of solvents used for surface preparation and cleanup.
   e) Gross and net amount of surface preparation and cleanup solvents used per month.
   f) Temperature recordings for the retention chamber of afterburner A-6.
   g) Monthly natural gas usage for A-6, in therms per month.
   h) Annual source test results.
   i) Emission calculations on a monthly basis when required to comply with Part 2.

All records shall be retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations.

VI. Permit Conditions

(Basis: BACT, Toxic Risk Screen, Cumulative Increase, RACT, Regulation 1-441, Regulation 2-6-409.2, Regulation 8-11-501 and 504)

VI. Permit Conditions

Condition # 12332

For S-47, S-48, S-49, S-50, S-51, S-52, S-55, S-56, S-57, S-59, S-130, S-131, COATERS AND OVENS:

14) The minimum temperature requirement of Part 4 shall not apply during an "Allowable Temperature Excursion" below the minimum temperature, provided that the controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:
   a) A temperature excursion not exceeding 20 degrees F; or
   b) A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
   c) A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.
      i. The excursion does not exceed 50 degrees F; and
      ii. The duration of the excursion does not exceed 24 hours.
      iii. The total number of such excursions does not exceed 12 per any consecutive 12 month period.

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit.

(Basis: Regulation 2-1-403)

15) For each Allowable Temperature Excursion that exceeds 20 degrees F and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described in Part 14. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
   a) Temperature controller setpoint
   b) Starting date and time, and duration of each Allowable Temperature Excursion
   c) Measured temperature during each Allowable Temperature Excursion
   d) Number of Allowable Temperature Excursions per month, and total number for the current calendar year and
   e) All strip charts or other temperature records.

   (Basis: Regulation 2-1-403)

16) For the purposes of parts 14 and 15, a temperature excursion refers only to

VI. Permit Conditions

temperatures below the limit. (Basis: Regulation 2-1-403)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S 47, 49, 51, 52, 59 AND 130– SHEET COATERS
S 48, 50, 55, 56, 57 AND 131 – CURING OVENS

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-11-301.1	Y		225 grams VOC per liter as-applied, excluding water	Regulation 8-11-501	P/D	Records
VOC	Regulation 8-11-302	Y		90 wt % destruction or greater	Regulation 8-11-504	C	Temperature Chart Recorder
VOC	BAAQMD Condition # 12332, Part 2	Y		Annual usage limits of 53,573 gallons of epoxy and 22,015 gallons of enamel or VOC emissions of 15,038 pounds	BAAQMD Condition # 12332, Part 13	P/A for usage or P/M for emissions	Usage Records and/or calculations
VOC	BAAQMD Condition # 12332, Part 3	Y		90 wt % or greater (destruction and capture efficiency) except 96% or greater for S-130 plus S-131	BAAQMD Condition # 12332, Part 8	P/A	Source Test

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S 47, 49, 51, 52, 59 AND 130– SHEET COATERS
S 48, 50, 55, 56, 57 AND 131 – CURING OVENS

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition # 12332, Part 3	Y		90 wt % or greater (destruction and capture efficiency) except 96% or greater for S-130 plus S-131	BAAQMD Condition # 12332, Parts 9 and 11	C	Control system

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S 47, 49, 51, 52, 59 AND 130– SHEET COATERS
S 48, 50, 55, 56, 57 AND 131 – CURING OVENS

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition # 12332, Part 3	Y		98 wt destruction % or greater	BAAQMD Condition # 12332, Part 8	P/A	Source Test
VOC	BAAQMD Condition # 12332, Part 3	Y		98 wt destruction % or greater	BAAQMD Condition # 12332, Parts 5, 14, and 15	C	Temperature Chart Recorder
VOC	BAAQMD Condition # 12332, Part 4	Y		1400 degrees Fahrenheit	BAAQMD Condition # 12332, Parts 5, and 14-16	C	Temperature Chart Recorder
Usage	BAAQMD Condition # 12332, Part 6	Y		Abatement device A-6 natural gas usage not to exceed 888,000 therms per year	BAAQMD Condition # 12332, Part 7	P/M	Fuel meter

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S 53, 54, 60, 61, 64, 65 – LITHOGRAPH PRESSES

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	SIP Regulation 8-11-301.9	Y		300 grams VOC per liter as-applied, excluding water	Regulation 8-11-501	P/E	Records

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S 53, 54, 60, 61, 64, 65 – LITHOGRAPH PRESSES

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-11-301.10	Y		300 grams VOC per liter as-applied, excluding water	Regulation 8-11-501	P/E	Records

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD 8-5-117	Exemption, Low Vapor Pressure	Manual of Procedures, Volume III, Method 28, Determination of Vapor Pressure of Organic Liquids from Storage Tanks
BAAQMD 8-11-301	Limitations	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings
BAAQMD 8-11-302	Emission of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25 or 25A.
BAAQMD Condition # 12332, Part 3	VOC Capture and Destruction Efficiency	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25 or 25A.

IX. GLOSSARY

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CEQA
California Environmental Quality Act

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

EPA
The federal Environmental Protection Agency.

Excluded
Not subject to any District Regulations.

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including

those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part

IX. Glossary

52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP
Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility
A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR
Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP
The District's Manual of Procedures.

NAAQS
National Ambient Air Quality Standards

NESHAPs
National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC
Non-methane Hydrocarbons

NOx
Oxides of nitrogen.

NSPS
Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR
New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment".

IX. Glossary

Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement
A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility
A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC
Precursor Organic Compounds

PM
Total Particulate Matter

PM10
Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD
Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP
State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2
Sulfur dioxide

Title V
Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

IX. Glossary

VOC
Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

X. APPLICABLE STATE IMPLEMENTATION PLAN

[Note: the SIP has been typed. If and when it is put on the District website, this section will not need to be included. If it is to be included, clerical staff will prepare it.]

See Attachments